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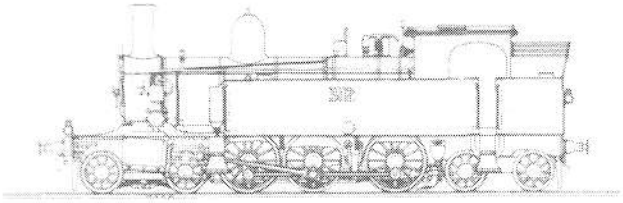
BANKSTOWN STEAM LOCOMOTIVE SOCIETY
CO-OPERATIVE LIMITED



8th March 2010

The Convention Secretary
Queensland Society of Model and Experimental Engineers Inc.
PO Box 322
Everton Park
Queensland 4053

Convention Voting Forms and Comments on Revised Code of Practice

Dear Sir,

Please find attached voting forms for the AALS Convention from Bankstown Steam Locomotive Society Co-op Ltd. These forms were completed at a general meeting of the Society held on Saturday 6th March 2008 at Ruse Park. They comprise of voting forms for a Proxy, for the three motions and for the AALS Vice president.

In respect of the Revised Code of Practice, Bankstown has decided to abstain from voting on the motion because we are of the opinion that the code, in the form posted on the AALS web site, is not yet ready for publication. We have found some areas to be confusing and there are some errors. We are of the opinion that the format is good and that the contents avoid standards that are too rigid. We certainly do not want to see standards that inhibit experimentation. However, some of the contents need correction to prevent the code becoming a lawyers' picnic and an excuse for underwriters to deny claims on our insurance. Hence critical issues, such as brakes, couplings and public passenger carrying cars must be unambiguous (water tight) while retaining the flexibility for model engineers that the present code provides. Some of these areas are not presently water tight.

We have listed the issues that we have found but we have not carried out a detailed edit of the documents as we do not feel that this is our role. We would be grateful if you would pass these comments on to the AALS Safety Committee.

Yours sincerely,

Roger Critchley,
Chairman, Bankstown Steam Locomotive Society Co-op Ltd.

THE SECRETARY
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Comments on the Draft Code of Practice as published on the AALS web site as at 4th March 2010

Operations

4.8.1 Gauge Infringement

There have been a number of discussions on this subject and our club to spend a considerable amount of money and effort broadening structures including bridges and a viaduct to meet the clearance specified to us as acceptable to the AALSSC. This dimension does not appear in the draft in fact, the wording in this draft does not specify any precise clearance. It simply says, as does the current COP "if any object can be touched by an outstretched hand then it is in the hazardous zone". Hence the clearance adopted under this rule will depend on the stature of the member determining the clearance.

5.2 Minimum Age

We note the minimum age for operators on non-public running days in the draft is nine years while the corresponding age in the proposed motion to be put to the meeting is seven years. We feel that seven is too young. Even though the young operator must be supervised, it can be difficult for the supervisor to reach the controls in an emergency when sitting behind a junior operator.

Are we correct in assuming that the words "competent person, eighteen years of age or older" as set out in Section 5.2.3 refers to persons meeting the requirements of Section 4.6 as distinct from the "Operator, eighteen years of age or older at all times." set out in Section 5.2.2 ?

We trust that these age limits have been discussed with and agreed to by the Insurance Broker on behalf of the Lead Underwriter.

Standards

4 Brakes

The section on brakes is again, we believe, ambiguous as some requirements have not been integrated and can result in conflict.

Section 4.2.1 specifies that effective brakes shall be fitted to carriages utilised for public passenger carrying. The implication – unbraked carriages are not permitted.

Section 4.2.1 specifies that trains of three or more carriages shall have at least one in three (or part thereof) carriages braked. The implication – two carriages in a three carriage train need not have brakes.

Section 4.2.5 specifies that Brakes are not required on a two carriage train. Implication – Two cars – no brakes. The train is to rely on the locomotive brakes. However, Section 4.1.2 states that, on locomotives, "the braking system shall be capable of stopping a light engine to the satisfaction of the owner/operator's Society Safety Officer/Committee." Implication – two loaded passenger carrying cars, one loco and one driving car not carrying passengers stopped by a brake capable of stopping only a light engine.

Could we suggest that substitution of the word "should" for "shall" in Section 4.2.1 would avoid the confusion around the fitting of brakes. To ensure that two car trains without brakes on the passenger cars can be stopped could we suggest that the minimum stopping power for locomotives be raised to that required to stop a train consisting of the loco, tender if fitted, riding car, and two passenger carrying cars loaded with the maximum number of adults for the gauge and demonstrated to the satisfaction of the Safety Officer or Competent Person of the operator's club.

We are also concerned about the owner being empowered to approve the efficacy of the locomotive's brakes; we believe that the safety officer, provided he does not have an interest in the locomotive, should determine the efficacy of the locomotive brakes. In the event that the Safety

Officer has an interest in the subject locomotive, the Competent Person should carry out the determination of brake efficacy.

Section 4.1.4 states that "Mechanical brakes should be capable of being retained on". What about power brakes being retained on? While most power brake systems will come off if there is a leak, they should still be capable of being retained on where possible.

Couplings

Section 10.2 Materials This section states that couplings shall be manufactured from mild steel with a minimum yield strength of 250 mPa and loaded to a maximum tensile working stress of 130 mPa. This is a carry over from Issue 1.

It is noted that the multiplying factors used in the S.I. system denotes the symbol m as milli or 10^-3. This means that the minimum yield strength specified is 2.5Pa and the maximum working stress is 1.3 Pa. This is equivalent to 0.0036 psi and 0.0019 psi respectively. These parameters should be 250 MPa and 130 MPa. Refer to page 17 & 18 of Model Engineers Handbook by Tubal Cain for a table of S.I. multipliers.

Index. We are of the opinion that there is a need for a comprehensive index as data and references to subject such as brakes are scattered through the Standards section of the draft. For example, brakes are included in Section 4(all subsections), 6.6, 7.1, 10.11

Definitions. We are of the opinion that the definition section of the Operations Volume needs to be reviewed as we were unable to define or find a definition for "continuous brake system" i.e. Is a "fail off" brake system considered to be a continuous brake system?